



July 9, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

**Re: In the Matter of Children's Television Programming Rules (MB
Docket No. 18-202); In the Matter of Modernization of Media
Regulation Initiative (MB Docket No. 17-105)**

Dear Ms. Dortch:

This letter is to notify you that Kathy Berthot, Attorney for the FCC Media Bureau Policy Division, and Evan Morris, Legal Advisor for the FCC Media Bureau Office of the Bureau Chief, telephoned Talia Rosen, Assistant General Counsel and Senior Director of Standards & Practices for the Public Broadcasting Service ("PBS"), on July 9, 2019.

This letter is being filed pursuant to the sunshine period prohibition exemption in Sections 1.1203(a)(1) and 1.1204(a)(10) of the Commission's rules, and an electronic copy of this letter is being filed in the above-referenced dockets pursuant to Section 1.1206 of the Commission's rules.

In response to a question from Ms. Berthot and Mr. Morris, PBS confirmed that – regardless of whatever the Commission may require – **all** PBS children's programming is closed captioned end-to-end on the PBS primary broadcast feed, the PBS KIDS 24/7 multicast broadcast channel, and the PBS KIDS online live stream. This closed captioning service is provided for the program itself, as well as all other program elements, including interstitials, promotional announcements, and underwriting acknowledgments.¹

In response to a follow-up question from Ms. Berthot and Mr. Morris, PBS explained that – over-and-above any Commission requirement – PBS voluntarily provides a descriptive video track for approximately 80 percent of its currently available catalogue of children's episodes on its primary feed and multicast channel, which amounts to the voluntary distribution of hundreds of hours of video described children's programming per calendar quarter.²

¹ PBS further explained that it cannot speak to the closed captioning practices of various local station breaks or any local program substitutions.

² PBS further explained that descriptive video tracks may not be passed through in some communities due to the limitations of local technical SAP capabilities.



Built on the principle of universal service, PBS and the public television system at large work every day to ensure that all Americans are able to access to our essential content and services.

Regards,

/s/ Talia Rosen

Talia Rosen

Assistant General Counsel and

Senior Director, Standards & Practices

PUBLIC BROADCASTING SERVICE

2100 Crystal Drive

Arlington, VA 22202

cc: Kathy Berthot
Evan Morris